



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 24, 2019

BY ECF

Honorable Denise Cote
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

**Re: United States v. Telemaque Lavidas,
19 Cr. 716 (DLC)**

Dear Judge Cote:

The Government respectfully submits this letter to request that the Court enter the attached protective order. The discovery in this case contains a significant volume of sensitive business and personal information and the proposed order will enable the government to meet its discovery obligations quickly and without the need for extensive redactions. The defendant, through counsel, has consented to the terms of the proposed order.

Respectfully submitted,

AUDREY STRAUSS
Attorney for the United States Acting
Under Authority Conferred by 28 USC 515

By: /s/
Daniel Tracer / Richard Cooper
Assistant United States Attorneys
(212) 637-2329/1027